

# GERSTEN SAVAGE LLP

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March 28, 2008

## VIA ELECTRONIC FILING

Hon. Charles P. Sifton  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
New York, New York 11201

**RE: United States v. Nikolai Dozortsev**  
**Docket No.: 08 CR 44 (CPS)**

Dear Judge Sifton:

Please accept this letter on behalf of the defendant, Nikolai Dozortsev, requesting that he be permitted to travel on a family vacation to Orlando Florida from April 18, through April 27, 2008. The Government does not consent to this application

Mr. Dozortsev's travel restrictions are presently confined to the Southern and Eastern District's of New York. In addition he is electronically monitored, and is permitted to be out of his home between 7:45 AM and 9:00 PM daily.

I have met with Pre-trial services Officer Anna Lee, who supervises Mr. Dozortsev while in the electronic monitoring program. She indicated that the defendant has been fully compliant with all condition of his release. In addition, Ms. Lee advised that since his release, he has requested, the government has consented, and the Court has approved his travel for a week on two separate occassions, to his vacation home in Pennsylvania. Ms. Lee further advised that the defendant was not monitored for the two weeks in Pennsylvania, and he was required to call in, which he did, and returned both times without incident.

Ms. Lee takes no position as to whether the defendant should be permitted to travel, but indicates that the defendant has complied with all conditions of his pre-trial release. She also explained that given the brevity of the trip, she would not have time to activate the electronic monitor, and therefore it would not be active for the period that Mr. Dozortsev would be in Orlando, Florida.

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If permitted, Mr. Dozortsev would be traveling with his wife and two of his three children. As an additional condition, the defendant would agree to surrender his wife and children's passport's while the family was in Orlando, Florida.

Based on the forgoing we respectfully request that the defendant be permitted to travel to Orlando, Florida with his family from April 18, through April 27, 2008.

Your consideration is greatly appreciated.

Very truly yours,

A handwritten signature in black ink, appearing to read "B. Zone", written over a horizontal line.

Barry S. Zone  
Attorney for defendant

cc.: AUSA Toni Mele